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COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
	§	
Senior Care Centers, LLC, <i>et al.</i> , ¹	§	Case No. 18-33967 (BJH)
	§	
Debtors.	§	(Jointly Administered)
	§	

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON OCTOBER 22, 2019 AT 9:30 A.M. (CT)**

MATTERS GOING FORWARD

1. Disclosure Statement for the Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 2054; Filed 10/16/2019]

Objection Deadline: July 22, 2019

Related Document(s):

- a) Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1425; Filed 06/24/2019]
- b) Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1426; Filed 06/24/2019]

¹ The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

- c) Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1427; Filed 06/24/2019]
- d) Second Amended Notice of (I) Hearing to Approve Disclosure Statement and (II) Deadline for Filing Objections to Approval of the Disclosure Statement [Docket No. 1635; Filed 07/26/2019]
- e) First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1684; Filed 08/02/2019]
- f) Disclosure Statement for the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1685; Filed 08/02/2019]
- g) Notice of Filing of First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1686; Filed 08/02/2019]
- h) Notice of Filing of Disclosure Statement for the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1687; Filed 08/02/2019]
- i) Debtors Reply in Support of the Disclosure Statement for the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1701; Filed 08/06/2019]
- j) Second Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1806; Filed 08/27/2019]
- k) Notice of Filing of Second Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code and Disclosure Statement for the Second Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1808; Filed 08/27/2019]
- l) Notice of Filing of Revised Form of Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1809; Filed 08/27/2019]
- m) Notice of Filing of Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code and Disclosure Statement for the Second Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 2055; Filed 10/16/2019]

Response(s) Received:

- a) Objection of Cedar Park Healthcare, LLC to the Debtors' Disclosure Statement and Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1578; Filed 07/22/2019]
- b) CIBC Bank USA's Objection to the Debtors' Disclosure Statement [Docket No. 1579; Filed 07/22/2019]
- c) Objection of Love Funding Corporation to the Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1586; Filed 07/22/2019]
- d) POTA JV, LLC's Objection to the Approval of the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1587; Filed 07/22/2019]
- e) Letter of Aaron Allison [Docket No. 1588; Filed 07/22/2019]
- f) TXMS Real Estate Investment, Inc.'s Objection to the Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1589; Filed 07/22/2019]
- g) The United States of America's Objection to (A) Debtors' Disclosure Statement and (B) Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1590; Filed 07/22/2019]
- h) United States Trustee's Objection to Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1591; Filed 07/22/2019]
- i) Independent Landlords' Objection to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1592; Filed 07/22/2019]
- j) Annaly / CHI Javelin Landlords' Objection to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1594; Filed 07/22/2019]

- k) ORIX Real Estate Capital, LLC's Objection to the Debtors' Disclosure Statement [Docket No. 1596; Filed 07/22/2019]
- l) Granite Landlords Objection to and Joinder in Objections to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1620; Filed 07/25/2019]
- m) Texas Health and Human Services Commission's Response to Disclosure Statement Objections filed by the United States of America and the United States Trustee [Docket No. 1632; Filed 07/26/2019]
- n) Texas Health and Human Services Commission's Limited Objection to Disclosure Statement for the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1695; Filed 08/06/2019]
- o) United States Trustee's Objection to First Amended Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1700; Filed 08/06/2019]
- p) OLP Wyoming Spring LLC's Limited Objection to Disclosure Statement [Docket No. 1703; Filed 08/06/2019]
- q) TXMS Real Estate Investments, Inc.'s Supplemental Objection to Debtors' Second Amended Disclosure Statement [Docket No. 1833; Filed 09/02/2019]
- r) Annaly / CHI Javelin Landlords' Joinder to TXMS Real Estate Investments, Inc.'s Supplemental Objection to Debtors' Second Amended Disclosure Statement [Docket No. 1835; Filed 09/03/2019]
- s) Limited Objection of Cedar Park Healthcare, LLC to the Debtors' (I) Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code and (II) Disclosure Statement for Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 2060; Filed: 10/18/2019]

Status: This matter will go forward.

2. Expedited Motion of Debtors for Entry of an Order (I) Approving Settlement Agreement, and (II) Granting Related Relief [Docket No. 1994; Filed 10/08/2019]

Related Document(s):

- a) Request for Expedited Consideration of Motion [Docket No. 1995; Filed 10/08/2019]
- b) Notice of Hearing [Docket No. 2035; Filed 10/15/2019]

Response(s) Received:

a) None

Status: This matter will go forward.

3. Expedited Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of a Certain Facility Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief [Docket No. 2011; Filed 10/11/2019]

Objection Deadline: October 18, 2019

Related Document(s):

- a) Request for Expedited Consideration of Motion [Docket No. 2013; Filed 10/11/2019]
- b) Request for Expedited Consideration of Motion [Docket No. 2014; Filed 10/11/2019]
- c) Notice of Hearing [Docket No. 2036; Filed 10/15/2019]

Response(s) Received:

a) None

Status: This matter will go forward.

4. Expedited Motion of Debtors for Entry of an Order (I) Approving Form of Operations Transfer Agreement, (II) Authorizing Transfer of the Operations and Related Assets of a Certain Facility Free and Clear of all Liens, Claims, Encumbrances, and Interests, and (III) Granting Related Relief [Docket No. 2012; Filed 10/11/2019]

Objection Deadline: October 18, 2019

Related Document(s):

- a) Request for Expedited Consideration of Motion [Docket No. 2013; Filed 10/11/2019]
- b) Request for Expedited Consideration of Motion [Docket No. 2014; Filed 10/11/2019]
- c) Notice of Hearing [Docket No. 2036; Filed 10/15/2019]

Response(s) Received:

a) None

Status: This matter will go forward.

5. Motion of Debtors for Entry of an Order (I) Approving Procedures Relating to Closure of a Skilled Nursing and Assisted Living Facility, (II) Authorizing the Abandonment of Certain Property in Connection Therewith, (III) Approving Use of Said Procedures and Abandonment for Other Potential Closures, With Additional Notice to Applicable Landlord and Regulatory Authorities, and (IV) Granting Related Relief [Docket No. 1918; Filed 09/20/2019]

Objection Deadline: October 11, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1919; Filed 09/20/2019]
- b) Response to Objections to Debtors' Motion for Entry of Order Approving Procedures Related to Closure of Skilled Nursing Facilities and Related Relief [Docket No. 2030; Filed 10/14/2019]

Response(s) Received:

- a) The United States of America's Objection to Motion of Debtors for Entry of an Order (I) Approving Procedures Relating to Closure of a Skilled Nursing and Assisted Living Facility, (II) Authorizing the Abandonment of Certain Property in Connection Therewith, (III) Approving Use of Said Procedures and Abandonment for Other Potential Closures, With Additional Notice to Applicable Landlord and Regulatory Authorities, and (IV) Granting Related Relief [Docket No. 2005; Filed 10/11/2019]
- b) Granite Landlords Objection to Motion of Debtors for Entry of an Order (I) Approving Procedures Relating to Closure of a Skilled Nursing and Assisted Living Facility, (II) Authorizing the Abandonment of Certain Property in Connection Therewith, (III) Approving Use of Said Procedures and Abandonment for Other Potential Closures, With Additional Notice to Applicable Landlord and Regulatory Authorities, and (IV) Granting Related Relief [Docket No. 2018; Filed 10/11/2019]
- c) Objection of White Oak Healthcare Finance, LLC to Motion of Debtors for Entry of an Order (I) Approving Procedures Relating to Closure of a Skilled Nursing and Assisted Living Facility, (II) Authorizing the Abandonment of Certain Property in Connection Therewith, (III) Approving Use of Said Procedures and Abandonment for Other Potential Closures, With Additional Notice to Applicable Landlord and Regulatory Authorities, and (IV) Granting Related Relief [Docket No. 2019; Filed 10/11/2019]

Status: This matter will go forward with respect to Clear Brook SCC, LLC. This matter will go forward as a status conference with regard to procedures for further facilities.

6. Application for Administrative Expense Claim filed by Creditor Granite Landlords [Docket No. 640; Filed 03/06/2019]

Status: This matter will go forward as a status conference regarding the status of the transition of Granite Facilities and scheduling future hearings.

7. Motion for Entry of an Order Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363 filed by Granite Landlords [Docket No. 641; Filed 03/06/2019]

Status: This matter will go forward as a status conference regarding the status of the transition of Granite Facilities and scheduling future hearings.

8. Granite Landlords' Motion to Enforce Terms of Settlement Agreement with the G-Debtors [Docket No. 1533; Filed 07/15/2019]

Status: This matter will go forward as a status conference regarding the status of the transition of Granite Facilities and scheduling future hearings.

Dated: October 20, 2019
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

/s/ Trey A. Monsour

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